

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In Re:)	
)	
ACE MOTOR ACCEPTANCE CORPORATION)	CASE NO. 18-30426
)	
Debtor.)	CHAPTER 11
)	

**LIMITED RESPONSE OF HAMILTON STATE BANK TO
DEBTOR'S APPLICATION TO EMPLOY ACCOUNTANTS**

Comes Now HAMILTON STATE BANK ("**Hamilton**") and files this limited response to the Debtor's *Application for Order Approving Debtor's Employment of Accountants* (the "**Application**") [Docket No. 50]. Hamilton respectfully states as follows:

1. Two items are somewhat unclear to Hamilton from its review of the Application on short notice: (i) whether the Debtor's proposed engagement of the accounting firm described in the Application (the "**CPA**") will ultimately provide benefit to the Debtor's insiders for the preparation of their individual tax returns (at the Debtor's expense), and (ii) whether the Debtor is seeking to pay any funds to the CPA at the present time.

2. Hamilton generally does not object to the engagement of the CPA for the filing of the Debtor's tax return(s), but contends no payment should be made by the Debtor to the CPA unless and until the CPA files a customary fee application as required by 11 U.S.C. §§ 330 and 331 which describes the services rendered, makes appropriate disclosures regarding the services or benefits provided to the Debtor's insiders (if any), and is otherwise subject to approval by the Court following notice to parties. To the extent the Application seeks to pay

any funds to the CPA at the present time, then Hamilton objects to the Application on that basis and to the extent such funds constitute “cash collateral” of Hamilton.

3. Hamilton does not object to any proposed payment by the Debtor’s insiders to the CPA in the approximate amount of \$5,950.00 to satisfy the CPA’s claim for pre-petition services as suggested by paragraphs 6 and 10 of the Application.

Dated: May 4, 2018

Respectfully submitted,

PARKER POE ADAMS & BERNSTEIN LLP

/s/ Kiah T. Ford

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that I have this date served the foregoing pleading by causing true and correct copies of the same (i) to be filed electronically using the Court's ECF filing system and (ii) delivered by United States first class mail, postage prepaid, and addressed as follows:

James H. Henderson
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Charlotte NC 28204-2826

U.S. Bankruptcy Administrator's Office
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Dated: May 4, 2018

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